IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

JANE DOE,

Plaintiff,

v.

GEORGIA DEPARTMENT OF CORRECTIONS, et al.,

Defendants.

Case No. 1:23-cv-5578-MLB

DEFENDANTS' MOTION FOR PERMISSION TO BRING ELECTRONIC DEVICES & TECHNOLOGY INTO THE COURTOOM

Counsel for Defendants requests the Court issue an order allowing Rachael C.T. Wyrick to bring cellular phones, smart phones, tablets, laptop computers, and other devices that may contain cameras into the United States Courthouse on Wednesday, April 30, 2025, for use at the hearing before the Court in Courtroom 1906 of the Richard B. Russell Federal Building at 10:00 a.m. *See* Local Rule 83.4. A proposed order is attached.

Dated: April 29, 2025

Christopher M. Carr

Attorney General
Georgia Bar No. 112505
Stephen J. Petrany
Solicitor General
Georgia Bar No. 718981
Georgia Department of Law
40 Capitol Square SW
Atlanta, Georgia, 30334
404-458-3408
spetrany@law.ga.gov

Attorneys for Defendants Georgia Department of Corrections, Tyrone Oliver, Randy Sauls, Chad I. Lohman, Sharon Lewis, Marlah Mardis, DeShawn Jones, Aaron Pineiro, Jamal Kinte Roberts, and Anthony Mulloy Respectfully submitted,

/s/ Rachael C.T. Wyrick
Jeffrey M. Harris*
Rachael C.T. Wyrick*
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Suite 700
Arlington, VA 22209
(703) 243-9423
jeff@consovoymccarthy.com
rachael@consovoymccarthy.com

Special Assistant Attorneys General and Attorneys for Defendants Georgia Department of Corrections, Tyrone Oliver, Randy Sauls, Chad I. Lohman, Sharon Lewis, Marlah Mardis, DeShawn Jones, Aaron Pineiro, Jamal Kinte Roberts, and Anthony Mulloy

CERTIFICATE OF COMPLIANCE

I certify that the foregoing brief conforms to the requirements of L.R. 5.1C and this Court's subsequent orders. The brief is prepared in 14-point Times New Roman font.

/s/ Rachael C.T. Wyrick

^{*}pro hac vice

CERTIFICATE OF SERVICE

I certify that on April 29, 2025, I electronically filed the foregoing with the Clerk of the Court using the Court's ECF system, which will automatically send email notification to all counsel of record.

/s/ Rachael C.T. Wyrick